

EXHIBIT 11

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF NEW JERSEY

3 IN RE: JOHNSON & :
4 JOHNSON TALCUM POWDER :
5 PRODUCTS MARKETING, :
6 SALES PRACTICES, AND :
7 PRODUCTS LIABILITY : CASE NO. 16-2738
8 LITIGATION : (FLW) (LHG)

9 THIS DOCUMENT RELATES :
10 TO ALL CASES :
11 :
12 MDL Docket No. 2738 :

13 - - -

14 Monday, January 7, 2019

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16 Videotaped Oral Deposition of
17 JUDITH K. WOLF, M.D. taken pursuant to
18 notice, was held at the Hilton Austin, 500
19 East 4th Street, Austin, Texas, beginning at
20 9:08 a.m., on the above date, before Micheal
21 A. Johnson, Registered Diplomate Reporter,
22 Certified Realtime Reporter, and Notary
23 Public for the State of Texas.

24 - - -

1 Q. Have you investigated whether
2 or not there is an amount of talcum powder
3 that can be used perineally without
4 increasing the risk for ovarian cancer?

5 MS. O'DELL: Objection, asked
6 and answered.

7 A. I don't know if there is an
8 amount that's safe. I don't know how I could
9 ethically test that. I'm not aware of
10 anything in the literature that says, "This
11 dose is safe, this dose is not." Because
12 even in all of the studies, what is a dose?
13 One shake? Two shakes? A hard shake? A
14 light shake?

15 BY MS. BROWN:

16 Q. Is your opinion, Dr. Wolf, that
17 some amount of perineal talcum powder use
18 causes ovarian cancer, is that opinion
19 dependent on an assumption that talcum powder
20 is contaminated with asbestos?

21 A. No, because --

22 MS. O'DELL: Object to the
23 form.

24 A. -- talcum powder is a mix of

1 things, right? It's a mix of platy talc,
2 fibrous talc, asbestos, heavy metals have
3 been found in it, nickel and chromium and
4 cobalt, and then all of the fragrances. And
5 I have seen the expert report of Michael
6 Crowley, where he assessed the irritant
7 quality of some of the fragrances. And so
8 when I look at the talcum powder product, I
9 look at it as a whole.

10 BY MS. BROWN:

11 Q. Do you believe there is
12 asbestos in talcum powder?

13 A. I've seen evidence that there
14 is asbestos found in at least 60 percent of
15 talcum powder that's been evaluated that I've
16 seen.

17 Q. Is it your opinion in this
18 case, that 60 percent of talcum powder is
19 contaminated with asbestos?

20 MS. O'DELL: Object to the
21 form, asked and answered.

22 A. In the reports that I've seen,
23 60 percent of the time there was evidence of
24 asbestos.

1 MS. O'DELL: Object to the
2 form.

3 A. I didn't say these cause
4 ovarian cancer. I say that they're known to
5 be carcinogenic and could be the cause of why
6 talcum powder products causes ovarian cancer.
7 And the other thing in there that I know can
8 be inflammatory, from reading Dr. Crowley's
9 report, are some of the fragrances that are
10 used. And since inflammation is a risk
11 factor and an initiator in -- leads -- is
12 related to the progression of ovarian cancer,
13 I have concerns about those.

14 BY MS. BROWN:

15 Q. And your opinion, then, Doctor,
16 as I understand it, is that you're not sure
17 which or what combination of all the items
18 you just listed to me are working to cause
19 cancer; is that right?

20 MS. O'DELL: Object do the
21 form.

22 A. My opinion is that it's the
23 talcum powder product as a whole that
24 increases the risk of ovarian cancer, and

1 I've listed things that I know are in there
2 that can be carcinogenic or inflammatory.

3 BY MS. BROWN:

4 Q. And to be clear, though, you
5 don't have an opinion as to the amounts of
6 any of the items you just listed for me as
7 they appear in baby powder, right?

8 MS. O'DELL: Object to the --
9 object to the form.

10 BY MS. BROWN:

11 Q. That was a bad question.
12 Here's what I want to know. I understand
13 your opinion is based on your assumption that
14 fragrance, platy talc, fibrous talc, heavy
15 metals and asbestos are in Johnson &
16 Johnson's products, correct?

17 MS. O'DELL: Object to the
18 form.

19 A. It's in talcum powder product.

20 BY MS. BROWN:

21 Q. And that would include Johnson
22 & Johnson's products, correct?

23 A. Would include any talcum powder
24 product.